

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: VALLEY DOORS & HARDWARE, INC. :  
DEBTOR : BKY. NO. 17-15165  
: CHAPTER 7**

**TRUSTEE'S MOTION FOR LEAVE TO SELL DEBTOR'S REAL ESTATE  
AND PERSONAL PROPERTY AT PRIVATE SALE PURSUANT TO  
11 U.S.C. SECTION 363(b)**

TO THE HONORABLE RICHARD E. FEHLING BANKRUPTCY JUDGE:

And Now Comes Michael H. Kaliner, Trustee, and respectfully files this Motion and in support thereof represents as follows:

1. The Movant is Michael H. Kaliner, the duly appointed Trustee herein.
2. The Debtor owns the real estate located at 1434-1436 W. Liberty Street, Allentown, PA 18102 (hereinafter referred to as "the real estate"); which it valued at \$300,000.00.
3. Additionally, it owns the following assets at the values set forth: 2009 Ford Cargo Van \$6,000.00; 2006 Ford Cube Van \$4,000.00; office equipment \$10,890.00, and inventory \$140,359.00. (hereinafter "the personal property") The Trustee believes the personal property has a value of \$30,000.00.
4. The Trustee has received an offer to purchase the real estate and personal property from Keiths Lock and Door Service, LLC for the sum of \$330,000.00 in accordance with the Agreement of Sale which is attached hereto and incorporated herein as Exhibit "A."
5. The following liens are recorded against the property: the mortgage of Lafayette Ambassador Bank in the approximate amount of \$170,000.00 plus interest.
6. The Trustee proposes to pay at closing 6% real estate commission to Setton Realty, all real estate and transfer taxes and other ordinary settlement costs, the mortgage of Lafayette Ambassador Bank and any and all liens or encumbrances.
7. This is the best offer which the Trustee has received.
8. The sale is fair and reasonable and in the best interest of the Estate.

**WHEREFORE**, the Trustee respectfully requests that this Honorable Court grant the relief requested.

/s/Michael H. Kaliner  
Michael H. Kaliner, Trustee  
**Adelstein & Kaliner, LLC**  
350 S. Main Street Suite 105  
Doylestown, PA 18901